

Exhibit D

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

LIBERTY RESOURCES, INC., et al., Plaintiffs, V. CITY OF PHILADELPHIA, Defendant.	Case No. 2:19-cv-03846-HB DEFENDANT’S RULE 26(A)(2) EXPERT DISCLOSURES
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Pursuant to Federal Rule of Civil Procedure 26(a)(2), Defendant City of Philadelphia designates the following individual expert witnesses who may testify at trial:

1. Dr. S. Lynne Stokes, Director, Data Science Institute, Southern Methodist University, Dallas, TX. A copy of Dr. Stokes’s expert report prepared in this matter is served herewith and contains a statement of her opinions and the basis for them. In her testimony, Dr. Stokes will address the matters contained in that report and may also respond to any opinions presented by Plaintiffs’ experts relating to these matters. Dr. Stokes’s qualifications, experience and publications are described in her curriculum vitae, provided with her report as Appendix D. A list of cases in which Dr. Stokes has provided expert testimony in the last 4 years either at trial or in deposition is provided with her report as Appendix E. A statement of Dr. Stokes’s compensation is contained in her report. In drafting her report and forming her opinions, Dr. Stokes relied upon the facts and data discussed in her report and identified in Appendix F thereto.

2. Bill Hecker, Accessibility Consultant, Hecker Design, LLC. A copy of Mr. Hecker’s expert report prepared in this matter is served herewith and contains a statement of his opinions and the basis for them. In his testimony, Mr. Hecker will address the matters contained in that

report and may also respond to any opinions presented by Plaintiffs' experts relating to these matters. Mr. Hecker's qualifications and experience are described in his curriculum vitae, attached as Exhibit I to his expert report, and includes lists of Mr. Hecker's publications over the past 10 years and cases in which he has provided expert testimony in the last 25 years either at trial or in a deposition. A statement of Mr. Hecker's compensation is contained in his report. In drafting his report and forming his opinions, Mr. Hecker relied upon the facts and data discussed in his report and identified in Exhibit III thereto.

Dated: June 11, 2021

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